

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**In re:**

**David L. Frankel**

**Debtor(s).**

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**Case No.: 18-11159**

**Chapter 7**

**Judge Jessica E. Price Smith**

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**NOTICE OF MOTION**

Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually but as trustee for Pretium Mortgage Acquisition Trust ("Creditor") has filed a motion with the Court to abandon the property located at 5215 Cheltenham Boulevard, Lyndhurst, OH 44124.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to enter an order abandoning the property, or if you want the court to consider your views on the motion, then on or before **December 5, 2018**, you or your attorney must:

File a written response, explaining your position, at:

Clerk of the United States Bankruptcy Court  
Howard M. Metzenbaum U.S. Court House  
201 Superior Avenue  
Cleveland, OH 44114

If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also mail a copy to:

Manley Deas Kochalski LLC  
Attention: Stephen R. Franks  
P.O. Box 165028  
Columbus, OH 43216-5028

If you or your attorney do not take these steps, the court may decide that you do not oppose the abandonment sought in the motion and may enter an order granting the abandonment.

Dated: November 14, 2018

/s/Stephen R. Franks

Stephen R. Franks (0075345)  
Edward H. Cahill (0088985)  
Adam B. Hall (0088234)

18-030114\_FXF

John R. Cummins (0036811)  
Karina Velter (94781)  
Sarah E. Barngrover (28840-64)  
Manley Deas Kochalski LLC  
P.O. Box 165028  
Columbus, OH 43216-5028  
Telephone: 614-220-5611  
Fax: 614-627-8181  
Attorneys for Creditor  
The case attorney for this file is Stephen R.  
Franks.  
Contact email is srfranks@manleydeas.com

18-030114\_FXF

**CERTIFICATE OF SERVICE**

This is to certify that on November 14, 2018, a true and accurate copy of the foregoing Notice of Motion and Opportunity to Object was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Office of U.S. Trustee, Northern District of Ohio, Party of Interest, (Registered address)@usdoj.gov

Waldemar J. Wojcik, Chapter 7 Trustee, wwojcik@wojciklpa.com

Adam S. Baker, Attorney for David L. Frankel, abakerlaw@sbcglobal.net

and on the below listed parties by regular U.S. mail, postage prepaid:

David L. Frankel, 5215 Cheltenham Blvd., Lyndhurst, OH 44124

David L. Frankel, 5215 Cheltenham Boulevard, Lyndhurst, OH 44124

Cuyahoga County Treasurer, 1219 Ontario Street, Rm 135, Cleveland, OH 44113

Huntington Mortgage, PO Box 1558, Dept. EA4W25, Columbus, OH 43216-1558

/s/Stephen R. Franks

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